

[*Parties and Counsel Listed on Signature Pages*]

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

THIS DOCUMENT RELATES TO:

People of the State of California, et al. v. Meta Platforms, Inc., et al.

MDL No. 3047

Case Nos. 4:22-md-03047-YGR-PHK

4:23-cv-05448-YGR

**META AND STATE AGS'
STIPULATION AND [PROPOSED]
ORDER EXTENDING CERTAIN
EXPERT DEADLINES**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

1 Pursuant to Civil Local Rules 6-1(b), 6-2, and 7-12, the State Attorneys General (“State AGs”)
2 and Defendants Meta Platforms, Inc.; Instagram, LLC; Meta Payments, Inc.; and Meta Platforms
3 Technologies, LLC (collectively, “Meta,” and together, the “Parties”), through their undersigned counsel,
4 hereby stipulate as follows:

5 1. Under the current case schedule, the deadline for the State AGs to submit certain expert
6 reports, including the reports of Patrick McDaniel and Carl Saba, is August 1, 2025; for Meta to submit
7 responsive expert reports is September 26, 2025 or eight weeks after opening reports; and for the State
8 AGs to submit rebuttal reports is October 24, 2025 or four weeks after responsive reports. *See* ECF 1955,
9 at 4–5.

10 2. The Parties have met and conferred over several weeks and have agreed, subject to Court
11 approval, to extend the deadline for the McDaniel and Saba opening expert reports by approximately six
12 weeks to September 12, 2025.

13 3. Certain discovery that the State AGs intend to incorporate into the McDaniel and Saba
14 reports has not yet been produced. Meta estimates that it can produce this discovery according to the
15 following schedule:

- 16 a. Additional supplemental production of underage user reporting and enforcement data
17 responsive to Request for Production No. 102 and PI/SD Request for Production No.
18 124 using different geographic filters, if any: on or around August 1, 2025.
- 19 b. Daily time spent data for Facebook: by July 25, 2025.
- 20 c. Supplemental response to Interrogatory No. 32: on or around July 25, 2025.
- 21 d. Soft-matching data and corresponding underage user reporting and enforcement data:
22 on a rolling basis, with production complete on or around August 15, 2025.

23 4. The Parties also agree, subject to Court approval, to extend the deadlines by approximately
24 three to four weeks for (a) Meta’s reports responsive to these two State AG expert reports; (b) the rebuttal
25 reports corresponding to these two expert reports; and (c) the close of expert discovery as related to these
26 two reports and any related responsive and rebuttal reports, as reflected in the chart below.

1 5. The Parties also agree, subject to Court approval, that, in order for the State AGs to
2 incorporate the soft-matching data described above in paragraph 3(d) into the McDaniel report, the State
3 AGs will serve a supplemental expert report of Patrick McDaniel regarding this data on September 19,
4 2025.

5 6. This Court has previously extended expert report deadlines generally, on agreement of all
6 parties to the MDL as part of an MDL-wide schedule extension, *see* ECF 1159, and again as to four State
7 AG-specific experts—including the two that are the subject of this extension—on agreement of the State
8 AGs and Meta, *see* ECF 1955.

9 7. The changes in these deadlines will not affect other deadlines in the case schedule. In
10 particular, existing deadlines regarding Rule 702 motions and dispositive motions will remain the same.
11 *See* ECF No. 1290; ECF No. 1955.

12 8. To the extent that Meta does not complete production of the discovery listed in paragraph
13 3 within the timeframe referenced in that paragraph, or produces incomplete or incorrect data, the Parties
14 agree to promptly meet and confer regarding further adjustments to the expert discovery schedule,
15 including the possible reduction of time within which Meta will have to serve responsive reports to the
16 McDaniel and Saba opening expert reports.

17 9. The Parties reserve all other rights related to the data listed in paragraph 3 and all other
18 productions of structured data that Meta has made or may make in this action, including as to any
19 incomplete or inaccurate productions.

20 10. Therefore, the Parties agree, subject to the Court's approval, that the following deadlines
21 will apply:

Event	Current Deadline	Proposed Deadline
Non-Case Specific and Causation Experts: Plaintiffs' Opening Reports	August 1, 2025 (for the State AGs' four AG-specific expert reports)	September 12, 2025 (for the opening reports of Patrick McDaniel and Carl Saba)
Supplemental Opening Expert Report of Patrick McDaniel	<i>No Current Deadline</i>	September 19, 2025
Non-Case Specific and Causation Experts: Defendants' Responsive Reports	September 26, 2025 (for Meta's responsive reports to the State AGs' four AG-specific expert reports), or approximately 8 weeks after Opening Reports, whichever is sooner	October 24, 2025 (for Meta's responsive reports to the McDaniel and Saba reports)
Non-Case Specific and Causation Experts: Plaintiffs' Rebuttal Reports	October 24, 2025 (for the State AGs' rebuttal reports in response to Meta's responsive reports to the State AGs' four AG-specific expert reports), or 4 weeks after Responsive Reports, whichever is sooner	November 14, 2025 (for the State AGs' rebuttal reports in response to Meta's responsive reports to the McDaniel and Saba reports)
Close of Expert Discovery	November 7, 2025 (for depositions of the State AGs' four AG-specific experts, Meta's responsive experts, and any AG rebuttal experts), or approximately 2 weeks after Rebuttal Reports	December 5, 2025 (for depositions of Patrick McDaniel, Carl Saba, Meta's responsive experts, and any AG rebuttal experts)

18 **IT IS SO STIPULATED AND AGREED.**

19 Respectfully submitted,

20 DATED: July 24, 2025

21 By: /s/ Megan O'Neill

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Instagram, LLC; Meta Payments, Inc.; and Meta
Platforms Technologies, LLC

13 **SIGNATURE CERTIFICATION**

14 Under Civ. L.R. 5-1(h)(3), I, Megan O'Neill, hereby attest that all signatories listed, and on
15 whose behalf the filing is submitted, concur in this filing's content and have authorized this filing.

16 DATED: July 24, 2025

17 /s/ Megan O'Neill

1 PURSUANT TO STIPULATION, IT IS SO ORDERED.
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DATED:

YVONNE GONZALEZ ROGERS
UNITED STATES DISTRICT JUDGE